

**Southern Illinois RSA Partnership
d/b/a First Cellular of Southern Illinois
King City Square
417 South 42nd Street
Mt. Vernon, Illinois 62864**

Via ECFS Electronic Filing

Marlene H. Dortch, Secretary
Federal Communications Commission
445 – 12th Street, S.W.
Washington, D.C. 20554

Attn: John B. Muleta, Chief, Wireless Telecommunications Bureau
David H. Solomon, Chief, Enforcement Bureau

**Re: CC Docket No. 94-102
Cellular Radiotelephone Service Station KNKN506,
CMA Market No. 401(B), Illinois 8 - Washington RSA; and
Cellular Radiotelephone Service Station KNKN820,
CMA Market No. 402(B), Illinois 9 – Clay RSA.**

E-911 Interim Report

Dear Ms. Dortch:

This report is being submitted pursuant to the requirements of the Commission's Order to Stay (CC Docket No. 94-102), FCC 02-210, released July 26, 2002 ("Stay Order") and the recently issued Public Notice, entitled "Wireless Telecommunications Bureau Provides Further Guidance on Interim Report Filings by Small Sized Carriers," Mimeo DA 03-2113, released June 30, 2003.

The Filer, Southern Illinois RSA Partnership d/b/a First Cellular of Southern Illinois, is a Tier III non-nationwide Commercial Mobile Radio Service carrier. The Filer was not granted relief in the Stay Order, but has pending before the Commission a request for similar relief. The information is presented in the format specified by the Commission, as follows:

A) The Number Of Phase I And Phase II Requests From PSAPs (including those the carrier may consider invalid): The Public Safety Answering Points ("PSAPs") in the Filer's twenty-four county service area are identified as follows: 1) Alexander County, Illinois – Illinois State Police at Ullin, Illinois; 2) Clay County, Illinois – Illinois State Police at Effingham, Illinois; 3) Edwards County, Illinois – Illinois State Police at Carmi, Illinois; 4) Franklin County, Illinois – Franklin County Sheriff Department; 5) Gallatin County, Illinois – Saline County Sheriff Department; 6) Hamilton County, Illinois – Illinois State Police at Carmi, Illinois; 7) Hardin County, Illinois – Illinois State Police at Ullin, Illinois; 8) Jackson County, Illinois – Jackson

County Sheriff Department; 9) Jefferson County, Illinois – Jefferson County Sheriff Department; 10) Johnson County, Illinois – Johnson County Sheriff Department; 11) Lawrence County, Illinois – Crawford County Sheriff Department; 12) Massac County, Illinois – Massac County Sheriff Department; 13) Perry County, Illinois – Perry County Sheriff Department; 14) Pope County, Illinois – Illinois State Police at Ullin, Illinois; 15) Pulaski County, Illinois – Pulaski County Sheriff Department; 16) Randolph County, Illinois – Randolph County Sheriff Department; 17) Richland County, Illinois – Richland County Sheriff Department; 18) Saline County, Illinois – Saline County Sheriff Department; 19) Union County, Illinois – Union County Sheriff Department; 20) Wabash County, Illinois – Illinois State Police at Carmi, Illinois; 21) Washington County, Illinois – Washington County Sheriff Department; 22) Wayne County, Illinois – Illinois State Police at Carmi, Illinois; 23) White County, Illinois – Illinois State Police at Carmi, Illinois; and 24) Williamson County, Illinois – Williamson County Sheriff Department.

The Filer has deployed Phase I E-911 equipment throughout its twenty-four county service area. The Filer has received requests for Phase I E-911 service from the PSAPs for the following counties:

<u>County</u>	<u>Request Date</u>	<u>Phase I In-Service Date</u>
Franklin	July 31, 2000	May 21, 2002
Gallatin	October 18, 2000	May 24, 2002
Jackson	August 1, 2000	May 1, 2002
Jefferson	June 12, 2000	January 29, 2003
Massac	May 17, 2001	Pending
Perry	January 23, 2001	May 2, 2002
Pulaski	July 18, 2000	April 26, 2003
Randolph	August 3, 2000	April 18, 2002
Richland	April 16, 2001	May 23, 2002
Saline	August 10, 2000	May 24, 2002
Union	June 13, 2000	April 26, 2002
Washington	April 16, 2001	June 5, 2002
Williamson	December 18, 2000	April 18, 2002

Consistent with Commission policy, the in-service dates shown above were negotiated with the requesting PSAPs. The Phase I request from the Massac County PSAP remains pending because the PSAP is not ready to process the Phase I data elements. The State of Illinois has in place a PSAP funding mechanism for Phase I E-911 service.

The Filer has received four PSAP requests for Phase II E-911 service, *i.e.*, from the PSAPs for Randolph, Saline, Williamson and Jefferson Counties. The Filer considers all four PSAP requests invalid because, to date, the State of Illinois does not have in place a PSAP funding mechanism for Phase II E-911 service. In addition, the Filer further considers the request from the Randolph County PSAP invalid because that PSAP specifically has advised that it is not capable of receiving and processing the Phase II E-911 Automatic Location Information (“ALI”) data elements. Furthermore, the Filer

additionally questions whether the Jefferson County PSAP's request is valid and whether it will remain operative for other reasons. This is because the Jefferson County PSAP's written request appears to suggest that the PSAP is under the mistaken assumption that the Filer is required to bear the PSAP's implementation costs and to design the PSAP's E-911 Phase II technical solution. As the Commission is aware, no Commission Rule imposes such duties on the Filer.

B) The Carrier's Specific Technology Choice (i.e., network-based or handset-based solution, as well as the type of technology used): The Filer's cellular systems currently provide both analog and Code Division Multiple Access ("CDMA") digital transmission capacity; and employ cellular base station and switching equipment manufactured by Motorola, Inc. ("Motorola"). In addition, the Filer intends to also install Global System for Mobile Communication ("GSM") digital transmission capacity. The Filer intends to deploy a network-based Phase II E-911 ALI solution.

Under the Filer's initial Phase II E-911 deployment plan, the Filer intended to install the necessary Phase II E-911 equipment and software throughout its twenty-four county service area without regard to whether it had received any PSAP requests for Phase II service from all of the affected PSAPs. A simultaneous, system wide deployment was viewed as the most cost-effective way over time to proceed and as providing a better integrated E-911 Phase II network. Under the original plan, the Phase II equipment and software was to be deployed and operational by June 30, 2003.

To achieve this goal, the Filer selected TruePosition as its Phase II E-911 equipment and software vendor of choice based upon its representations that its equipment was compatible with the Filer's Motorola cellular system equipment. TruePosition provided the Filer with a contract for the purchase and installation of the necessary equipment and software on a turn-key basis throughout the Filer's twenty-four county service area for a total price of \$1.2 Million. On February 24, 2003, the Filer signed the contract and returned it to TruePosition. However, to date, the Filer has not been provided with a copy of the contract executed by TruePosition (if, indeed, TruePosition ever signed the contract at all), even though TruePosition assured the Filer in mid-April of 2003 that the signed contract would be returned within "a few weeks."

On or around May 1, 2003, True Position advised the Filer that the TruePosition Phase II E-911 ALI equipment and software is not compatible with the Filer's Motorola cellular system equipment, notwithstanding its prior representations to the contrary which it had made to the Filer prior to the Filer's execution of the TruePosition-provided contract. This led to consultations between Motorola and TruePosition to determine whether a technical solution to the compatibility problem can be devised.

By letter dated June 27, 2003, Motorola advised the Filer that it had tested and certified a TruePosition network-based Phase II E-911 ALI solution between August 20, 2001 and September 13, 2001. However, it appears that TruePosition decided against commercializing the solution which was the subject of those tests, and instead elected to redesign the product. The resulting redesigned product is not compatible with the

Motorola equipment. Motorola is continuing to evaluate the matter. It should also be noted that TruePosition has refused to provide the Filer with the Phase II ALI solution which was the subject matter of the August 20 – September 13, 2001 tests with Motorola.

The Filer has also brought Grayson Enterprises (the other major network-based solution vendor) back into the process to see if a solution can be devised with Motorola.

Additional details regarding the problems encountered are set forth in the status update letters which the Filer is sending to the Randolph, Saline, Williamson and Jefferson County PSAPs. A copy of one of the letters is appended hereto as Attachment A.

Thus, as the Commission can plainly see, the Filer is (and has been) ready, willing and able to install network-based Phase II E-911 ALI equipment and software, but has been frustrated from doing so by a lack of compatible equipment.

C) Status Of Ordering And/Or Installing Necessary Network Equipment:
See the response to Item B, above.

D) If The Carrier Is Pursuing A Handset-Based Solution, Include Information On Whether ALI-Capable Handsets Are Now Available, And Whether the Carrier has Obtained ALI-Capable Handsets Or Has Agreements In Place To Obtain These Handsets: This area of inquiry is not applicable because the Filer is not currently pursuing a handset-based Phase II E-911 ALI solution.

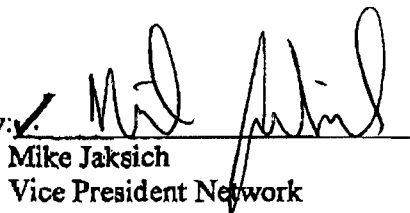
E) The Estimated Date On Which Phase II Service Will First Be Available In The Carrier's Network: Due to equipment compatibility issues, the Filer is unable to estimate the date on which Phase II service will first be available in the Filer's service area.

F) Information On Whether The Carrier Is On Schedule To Meet The Ultimate Implementation Date Of December 31, 2005: This area of inquiry is not applicable because the Filer is not currently pursuing a handset-based Phase II E-911 ALI solution.

Very truly yours,

**Southern Illinois RSA Partnership
d/b/a First Cellular of Southern
Illinois**

Dated: 7-30-03

By: 
Mike Jaksich
Vice President Network
Operations

Declaration Under Penalty Of Perjury

I, Mike Jaksich, hereby state the following under penalty of perjury: I am the Vice President Network Operations of Southern Illinois RSA Partnership d/b/a First Cellular of Southern Illinois. I have read the foregoing "E-911 Interim Report," and all statements of fact set forth therein are true and correct to the best of my knowledge, information and belief, and are made in good faith. Executed this 30th day of July, 2003.


Mike Jaksich

Refer All Inquiries And Correspondence To:

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July 28, 2003

MR. Ken Smith
Williamson County E-911 Coordinator
3232 South Park Avenue
Herrin, Illinois 62948

Dear Mr. Smith:

I'm writing this letter to bring you up to speed on First Cellular's E-911 Phase II initiative. I believe Terry Addington spoke with you a few weeks ago and explained that there appear to be some compatibility issues with our Motorola switch and the Position Determining Equipment (PDE) at the cell sites. I would like to take this opportunity to explain in detail what the situation currently is, how the time line has played out to this point and explain some possible scenarios for getting this situation rectified.

Let me just start off by saying that First Cellular is extremely disappointed that we have not been able to deploy a solution by now. Our 2003 marketing plan allocated the capital needed to deploy a network solution based on terms and conditions presented by one of the solution providers, TruePosition. Based on their input we had hoped and expected to be online by this time. Unfortunately, things out of our control have caused us to miss our objective. For your information, let me recount the sequence of events that have transpired to take us where we are today.

First Cellular received our first Phase II request on February 20th, 2002. Since then we have received two other requests. Since there was no cost recovery in place these were not considered to be valid requests. However, in the interest of public safety and for our customers and the people of Southern Illinois, we planned to proceed anyway. In our 2003 business plan we allocated 30% of our capital budget to the E-911 phase II project sans cost recovery. After researching PDE manufacturers we found out there were only 2 major players in the industry, Grayson Wireless and True Position. We made contact with both firms and invited them out to present their product. Our first meeting was with Grayson Wireless on March 11, 2002. After several unsuccessful attempts to get True Position on site we decided to move forward with Grayson. Soon after this decision was made, it was discovered that Motorola had certified interoperability with only one PDE vendor, True Position. We resumed our dialogue with True Position, and on August 26th 2002 we finally were able to get the full presentation of their product. Shortly after our meeting in August we initiated contract negotiations with True Position. To say this was an arduous undertaking would be a large understatement. We finally received a contract for execution at the end of February 2003; First Cellular executed the agreement on February 24, 2003 and sent the document to True Position to do the same. For the next 60 days the contract was mired in the legal process at True Position. During the middle of April, 2003 First Cellular was assured that a contract would be in our hands within "a few weeks". It was during those few weeks that we learned True Position had developed a new version of it's PDE, and as luck would have it, the new equipment is now **not** compatible with the Motorola switch and they refuse to sell to us the version of their product that is compatible.

Since this discovery at the beginning of May, we have brought Grayson back into the process and put them in contact with Motorola to try and work on a solution. Both Grayson and True Position are

exchanging information with Motorola in an effort to come up with an answer to our problem. As of the writing of this letter the conversations are ongoing. I've attached a letter from Motorola that basically says they are trying to evaluate the possibility of coming up with a solution. As you will see they have not actually promised anything nor are discussions promising.

We envision four ways in which this situation can play out. The most hopeful is that Motorola and Grayson will come up with a solution and be able to implement it in a timely fashion. A second possibility would be that First Cellular changes our technology choice from a network-based solution to a handset-based solution. If the decision is made to take this route there are a couple key facts that should be discussed. One, in a handset solution, callers need to have a special phone in order for the service to work. This will preclude any analog device (currently around 20,000 in our network) from being located. Another concern would be our ability to locate roaming mobiles in our network (tens of thousands a month). A handset solution would only be effective for our digital customers traveling within our system only. If a handset solution is used the FCC mandated that by December 31, 2005 at least 95% of the handsets used by our subscribers be location capable. A network solution, on the other hand, would enable all of our users to be located as of the date of implementation. A third, and most likely scenario would be that Grayson and Motorola come up with a network-based solution that will entail an intensive software upgrade along with a lengthy test period which could very conceivably stretch into late 2004 and even 2005. Since the cost, feasibility and time frame of this possibility is still an unknown, we cannot tell you which of these scenarios will be the path we need to take. A fourth scenario, similar to number two, is that Motorola will not support a solution due to switch and software obsolescence thereby forcing us to the less acceptable (and less desirable from a safety standpoint) handset solution.

The bottom line is this, the September 1st deadline, imposed by the FCC for E-911 phase II compliance will, in all likelihood, not be met. First Cellular is currently working with our legal counsel in Washington D.C. to get an extension petition filed with the FCC. We are still very committed to being Phase II compliant as quickly as possible and we hope the delay does not adversely affect your organization. Please understand, we are just the carrier and are completely reliant on the solution provider and our network infrastructure provider.

On another note, First Cellular has made the decision to overlay our current CDMA digital system with a GSM digital system. Basically, that is an additional digital communications service that will enable us to better serve our roaming traffic and offer our customers some new data services. This does not mean a whole lot to the E-911 initiative unless we end up having to go with a handset based solution on our current network. GSM does not currently support handset-based services so, in the near term at least, we would have to use a network solution on the new GSM system. This will mean an entirely different Phase II system for each of our two digital networks. We expect 60% of our GSM network to be up and running by the end of this year and have started the process of contracting a supplier to deliver a solution on this network. Since Ericsson supplies this network, we do not anticipate the same problems we are encountering with Motorola.

Please feel free to contact me with any questions you may have.

Thank you for your patience and understanding.

Sincerely,

Mike Jaksich
VP Network Operations